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VIA ECF

July 8, 2025

Honorable Katharine H. Parker
U.S. District Court
Southern District of New York
500 Pearl Street, Room 750
New York, NY 10007

APPLICATION GRANTED: The Case Management Conference set for 7/10/2025 at 10:00 AM in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to **Thursday, August 14, 2025 at 12:30 p.m.**

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

07/08/2025

Re: *Bonilla et al. v. Lucero Produce II Corp. & Saul Lucero*, 22-CV-153 (AS) (KHP)

Dear Judge Parker:

We represent Plaintiffs in the above referenced matter. We write jointly with Defendants pursuant to Section 1(c) of Your Honor's Individual Practices to request an adjournment of the July 10, 2025 case management conference. See Dkt. 83. The Parties request an adjournment of approximately thirty (30) days, to August 6, 7 or 13, 2025 or a date amenable to this Court. The reason for this request is twofold: first, Defendants' counsel has an appearance in another matter that cannot be moved; and second, Defendants have made significant progress towards curing the deficiencies raised in Plaintiffs' June 16, 2025 letter. See Dkt. 82, 83.

At this point, the only outstanding items are the following:

- (1) Defendants' payment owed to Plaintiff Hector Martinez for \$2,954.53 (\$2,864.53, plus an additional \$90, to make up for earlier shortfalls, *see* Dkt. 82, ¶¶ 2, 3);
- (2) Defendants' payments owed to each Plaintiff due to errors in withholdings for the fourth settlement payment, in the following amounts:
 - a. Alicia Bonilla: \$1,706.48
 - b. Hector Martinez: \$2,183.90
 - c. Fabian Treviño: \$3,568.28
 - d. Domingo Morales: \$2,35.73

On July 7, 2025, Defendants' counsel represented that Defendants are in the process of making those outstanding payments, and the Parties thus agreed to jointly request an adjournment of the July 10, 2025 conference. This is the Parties' first request for an extension.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Anamaria Segura
Anamaria Segura

cc: All counsel of record